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November 9, 2000

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Attn: Jay Whaley, Policy Division, Wireless Telecommunications Bureau

Re: Unwired Telecom Corporation  
TRS# 814891  
Carrier Reports on Implementation of Wireless E911 Phase II  
Automatic Location Identification - CC Docket No. 94-102

Dear Ms. Salas:

Unwired Telecom Corporation ("Unwired") hereby files its report on implementation of Wireless E911 Phase II Automatic Location Identification ("ALI") (CC Docket No. 94-102) pursuant to Section 20.18(i) of the Commission's Rules. Unwired provides this report of its plans with the caveat that these plans do not constitute a final or irrevocable commitment to the ALI technology it will employ.<sup>1</sup> Updates will be provided as appropriate.<sup>2</sup>

Unwired plans to use a network-based technology. The company has engaged in extensive research seeking to identify vendors that provide network-based, handset-based and hybrid Phase II location technologies and has identified the following: U.S. Wireless, Grayson Wireless (a division of Allen Telecom), Sigma One, Radix Technologies, Signal Soft and True Position. Unwired has sought diligently to contact these vendors with no success to date.

One of the vendors that have yet to respond to requests for information is U.S. Wireless. U.S. Wireless was specifically referenced by the Commission as an alternative to the traditional high-cost network-based vendor because it offers location information through a service bureau

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<sup>1</sup>See *Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification: Public Notice*, CC Docket 94-102; DA 00-2099 (rel. Sept. 14, 2000) ("Public Notice").

<sup>2</sup>A facsimile copy of the Declaration by an authorized company representative attesting to the accuracy of this report is attached. A supplemental filing will be made after the original has been received.

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approach.<sup>3</sup> The Commission stated that the proposed services of this vendor provides a basis for denying waiver or extension requests made on behalf of rural carriers.<sup>4</sup> Contrary to the Commission's contention that this vendor provides an opportunity for rural carriers to avoid up-front investment in network-based solutions, however, it appears that the proposed services will not be available on a timely basis to areas in which Unwired provides service because the named vendor is concentrating on urban markets.<sup>5</sup>

From the company's research, it appears that two vendors, Grayson Wireless and TruePosition, have products that would provide network-based solutions. However, the cost of deployment of such solution is prohibitively expensive, especially since the State of Louisiana does not provide for cost recovery of a carrier's cost related to implementation of E911.<sup>6</sup>

Given the minimal number of vendors that offer reasonably priced viable solutions for the markets served by Unwired, the company is unable to provide specifics regarding testing and verification. Additionally, to date, Unwired has not received a Phase II request from a PSAP that is capable of receiving and utilizing the data elements and has a mechanism in place for recovering the PSAP's costs. Accordingly, the company's plans do not reference any schedules for installation of the hardware and software needed to implement the network-based technologies.

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<sup>3</sup>See *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Fourth Memorandum Opinion and Order*, CC Docket 94-102, para. 29 (rel. Sept. 8, 2000) (Fourth MO&O) (Commission specifically noting that U.S. Wireless proposes to provide location information as a service to carriers).

<sup>4</sup>*Id.* at para. 71 & n.127 (Commission denying a request for extension of the Phase II deadline for rural carriers filed by United States Cellular Corporation ("USCC") based in part on its finding that "other network-based solutions may prove less expensive for rural carriers . . . to implement, especially where they are being offered on terms that do not require an up-front investment by carriers" and referencing as an example the vendor proposal of U.S. Wireless).

<sup>5</sup>See "Verizon Wireless and U.S. Wireless Corporation Announce Successful Testing of CDMA Location System for Emergency 911 Caller Location" [www.uswcorp.com](http://www.uswcorp.com) (March 10, 2000) ("U.S. Wireless plans to build and operate its nationwide location service bureau in 100 major markets across the United States, beginning with the Washington, D.C./Baltimore metro area"(emphasis supplied)).

<sup>6</sup> The company has been informed by other carriers that Grayson Wireless will charge approximately \$25,000 per cell site plus a \$65,000 central control system to install its solution. See Fourth MO&O at para. 71 (Commission citing USCC's estimate that it would cost about \$90 million to upgrade its more than 2,500 cell sites to employ TruePosition's network-based solution (approximately \$36,000 per cell site)).

**Magalie Roman Salas**

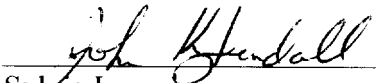
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Please let me know if you have any questions regarding this report.

By:   
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